IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

VALERIE MACK,

Plaintiff,

v. Case No.: 3:13-cv-01976-P

AVARA COMMUNITY HEALTH SERVICES, INC.,
and ALBERT OGUNTULA,

Defendants.
______________________________________/

DECLARATION OF CHARLES SCALISE

1. My name is Charles Scalise and I am over 18 years of age, competent to make this declaration, and making this declaration pursuant to the provisions of 28 U.S.C. § 1746.

2. I am a licensed attorney practicing in Travis County, Texas. I represent the Plaintiff in this matter.

3. I have been a member of the Florida Bar since 1988 and a member of the Texas Bar since 2008. I have practiced exclusively in the area of employment law for fourteen years and have over 20 years of civil litigation experience. During the past nine years my practice has been almost exclusively dedicated to representing employees with wage claims, including claims brought under the Fair Labor Standards Act.

4. I am familiar with the rates charged by attorneys with similar experience in Central Texas. A reasonable hourly fee for a lawyer with similar experience and expertise is $350.00 per hour. I have previously been awarded $350.00 per hour by other federal courts including the Dallas Division of the Northern District of Texas regarding similar type claims. *See, e.g., Peoples v. Ali Shaun Ganji d/b/a Beverage Depot #2*, Case No. 3:11-cv-169-BK.

5. Jon D. Rankin has trained and worked as a paralegal since February of 2000. He has extensive trial experience in both State and Federal Court, and has extensive experience in drafting appellate briefs, legal memoranda, complaints, discovery, motions and affidavits. He possesses strong research and writing skills and a vast knowledge of both State and Federal labor and employment law, State and Federal Rules of Civil Procedure, State and Federal Rules of Appellate Procedure and State and Federal Rules of Evidence. Mr. Rankin possesses skills that are equivalent to those of a law clerk rather than a paralegal. A reasonable hourly market rate for Mr. Rankin's services is $125.00 per hour. *See Gromer v. Mack*, No. 3:11–CV–0682–D, 2012

U.S. Dist. LEXIS 847, at *3–5, 2012 WL 28835 (N.D.Tex. Jan. 4, 2012) (awarding $125/hour for paralegal services); *Richardson v. Tex-Tube Co.*, 843 F.Supp.2d 699, 708 (S.D. Texas, February 10, 2012) (same); *Humphrey v. United Way of Texas Gulf Coast*, 802 F.Supp.2d 847, 864 (S.D. Texas, July 28, 2011) (same).

6. The Ross Law Group performed the services on the dates for the time indicated in the attached time records.

7. The Plaintiff in this case has incurred a filing fee of $400.00 and a service of process fees of $129.00.

I declare under penalty and perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 7, 2014, in Austin, Texas.

Charles Scalise